

✓ BKK/00

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----

Docket No. 05-0069

PUBLIC UTILITIES COMMISSION

HAWAIIAN ELECTRIC COMPANY, INC.
For Approval and/or Modification of Demand-
Side and Load Management Programs and
Recovery of Program Costs and DSM Utility
Incentives

PUBLIC UTILITIES
COMMISSION

2005 APR -4 P 4:04

FILED

MOTION TO INTERVENE

OF

HAWAII RENEWABLE ENERGY ALLIANCE

AND

CERTIFICATE OF SERVICE

Warren S. Bollmeier II, President
Hawaii Renewable Energy Alliance
46-040 Konane Place #3816
Kaneohe HI 96744

(808) 247-7753
wsb@lava.net

Accordingly, Movant has a substantial and continuing interest in the subject of renewable energy and energy efficiency policy and implementation in the electric utility sector. Movant believes that the Instant Docket is a logical follow-on to the DG docket, and anticipates contributing to the record regarding the issues identified by the PUC page 12 of its Decision and Order No. 21698, March 16, 2005.

ARGUMENT

Pursuant to Hawaii Revised Statutes Section 269-6 and Sections 6-61-41 and 6-61-55, Rules of Practice and Procedure before the Public Utilities Commission, Chapter 61, of Title 6 of the Hawaii Administrative Rules, Movant states the following in support of its motion:

1. Nature of Movant's Statutory or other Right to Participate in this Proceeding.

By opening this Docket, the Commission has invited all interested electric service providers, organizations, business groups and community groups to participate in this docket as intervenors or participants.

Petitioner is an "organization" within the meaning of the invitation.

2. The Nature and Extent of the Applicant's Property, Financial, and Other Interest in the Pending Matter.

Member organizations and individuals are owners, employees, consultants or agents involved in and/or considering Demand-Side and Load Management programs, and are concerned about the structure of these programs, access to the market and other issues. Accordingly there are substantial financial and other interests implicated in this docket.

3. Effect of Pending Order upon Movant's Interest.

See #2 above.

4. Other Means by Which the Movant's Interest may be Protected.

None.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Motion to Intervene upon the following parties by causing a copy hereof to be hand-delivered or mailed, postage prepaid, and properly addressed the number of copies noted below to each such party:

DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
DIVISION OF CONSUMER ADVOCACY
P. O. Box 541
Honolulu, Hawaii 96809

WILLIAM A. BONNET
VICE-PRESIDENT, GOVERNMENTAL AND COMMUNITY AFFAIRS
HAWAIIAN ELECTRIC COMPANY INC
P. O. Box 2750
Honolulu, Hawaii 96840-0001

PATSY H. NANBU
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawaii 96840-0001

THOMAS W. WILLIAMS, JR. ESQ.
PETER Y. KIKUTA, ESQ.
GOODSILL, ANDERSON, QUINN & STIFEL
Alii Place, Suite 1800
1099 Alakea Street
Honolulu, Hawaii 96813

DR. KAY DAVOODI
UTILITIES RATES AND STUDIES OFFICE
NAVFAC WASHINGTON
1314 Harwood Street, S. E.
Washington Navy Yard, DC 20374-5018

RANDALL Y. K. YOUNG, ESQ.
AVAL FACILITIES ENGINEERING COMMAND PACIFIC
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134

E. KYLE DATTA
ROCKY MOUNTAIN INSTITUTE
P. O. Box 390303
Keauhou, Hawaii 96739

HENRY CURTIS
VICE PRESIDENT FOR CONSUMER AFFAIRS
LIFE OF THE LAND
76 North King Street, Suite 203
Honolulu, Hawaii 96817